

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

HILLTOP CHURCH OF THE §  
NAZARENE, §  
§  
Plaintiff, §  
§  
v. § CIVIL ACTION NO. 6:21-CV-00322-JCB  
§  
§  
CHURCH MUTUAL INSURANCE §  
COMPANY, §  
§  
Defendant. §

**AGREED MOTION FOR EXTENSION OF TIME TO REPLY TO  
RESPONSE TO MOTION FOR SUMMARY JUDGMENT**

Plaintiff Hilltop Church of the Nazarene (“Hilltop” or “Plaintiff”) and Defendant Church Mutual Insurance Company (“Church Mutual” referred to collectively with Hilltop as the “Parties”) move jointly to extend Church Mutual’s deadline to file its reply to Plaintiff’s Response and Brief in Opposition to Defendant’s Motion for Summary Judgment. [Dkt. 34] As grounds for this Joint Motion, the parties state the following:

The Court’s October 13, 2021 Scheduling Order provides for an August 8, 2022 dispositive motion deadline. [Dkt. 8] Accordingly, Hilltop filed its Motion for Summary Judgment on August 8, 2022. [Dkt. 30] According to Local Rule CV-7, when a party opposes a motion that is not a summary judgment motion, that party has fourteen days from the date the motion was served to file a response. For summary judgment motions, however, the Rule gives a party twenty-one days from the date the motion was served to file a response. Consequently, Hilltop filed its response to Church Mutual’s Motion for Summary Judgement on its deadline of August 29, 2022. [Dkt. 34]

Although Local Rule CV-7 gives a party an extra week to draft a response to a motion for summary judgement, there does not appear to be a similar extension for reply briefs. Nevertheless, due to various scheduling issues and counsel's previously planned vacation, the Parties have agreed to extend Church Mutual's deadline to reply through and until Tuesday, September 13, 2022.

Because the requested extension will allow Church Mutual sufficient time to develop and draft its reply, which will ultimately help the Court in making its final determination, good cause exists to extend Church Mutual's deadline to reply to Hilltop's response.

This Joint Motion is not brought for any improper purpose. Neither party will be prejudiced if the Motion is granted.

WHEREFORE, the Parties respectfully request that this Court grant this Motion and extend Church Mutual's reply deadline to Tuesday, September 13, 2022 and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF**

-and-

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**ATTORNEYS FOR DEFENDANT  
CHURCH MUTUAL INSURANCE  
COMPANY**

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing has been served on the following counsel of record in accordance with FEDERAL RULES OF CIVIL PROCEDURE on this 2<sup>nd</sup> of September 2022:

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**CERTIFICATE OF CONFERENCE**

Counsel for Defendant and counsel for Plaintiff complied with the meet and confer requirement in Local Rule CV-7(h) on September 1, 2022 and confirmed that Plaintiff is unopposed to the relief requested herein.

Certified on the 2nd Day of September, 2022 by:

/s/ Lindsey P. Bruning

Lindsey P. Bruning